

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl St., New York, NY 10007

September 11, 2024

Re: United States of America v. Aafia Siddiqui
Case No. 08-cr-826 (RMB)

Dear Judge Berman:

I, Clive Stafford Smith, Esq., attorney of record for the Defendant, Aafia Siddiqui, write to respectfully request that the Court issue an expedited ruling upon Defendant's Motion for a Protective Order, filed with the Court on September 5, 2024. Counsel humbly requests a ruling on the Motion by end of day Friday, September 13, 2024, or latest early Monday, September 16, 2024 for the reasons specified below in this Letter. The Court has set noon (12 pm) EST on Friday, September 13, 2024, as the deadline for the Government to respond to the Motion.

Counsel acknowledges that the Court's schedule is demanding, and that this is an unusual request. I therefore apologize both for my presumptuousness and for the inconvenience this request may cause to the Court. The reason for this request is that I am based in the United Kingdom, and travel only periodically, at personal cost, to the United States to meet with the Defendant. I will be in New York only for a limited time, from Sunday, September 15, through Wednesday, September 18, 2024, and, as the principal investigator in this case, would appreciate the opportunity to work through the physical form material that is the subject of the existing Protective Order.

Given the critical timeline and complexity of the investigation, which involves multiple jurisdictions both within the United States and abroad, an ongoing proceeding in Pakistan, and the sensitivity of the documentary material, it would be of immense assistance if the Court could issue a ruling on this matter by the date requested above. An expedited ruling would greatly aid the defense team's efforts in managing the cross-border investigation and ensure that we can act promptly based on the Court's guidance.

Thank you for your consideration of this request. Should the Court require any additional information or clarification, I or my co-counsel in the matter, Hassan E. Ansari, Esq., are available at your convenience.

Respectfully,

/s/Clive Stafford Smith/

Clive Stafford Smith, Esq.
Attorney for Defendant

cc: counsel of record for the Government (via ECF)